

# EXHIBIT “N”

**From:** GARY LIGHTMAN garylighman@lightmanlaw.com  
**Subject:** Fwd: Zekaria Deposition 5/28/24  
**Date:** May 15, 2024 at 9:26 AM  
**To:** Patrick Healey phealey@rebarkelly.com  
kditomaso@lightmanlaw.com

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## SETTLEMENT COMMUNICATION

Patrick,

Notwithstanding our below email to you, and as we previously informed you, we do NOT wish to put you personally in an untenable position, vis-a-vis your representation of the Zekaria Defendants and your pending Motion to Withdraw (returnable on 6/13).

SO, if you (1) produce the February 2022 retainer/escrow agreement for us by Friday, *and* (2) give us firm dates between June 14-30 when Zekaria is available to be deposed, then we will agree to re-schedule the 5/28 deposition to one of those June dates.

pls lmk

thx  
Gary Lightman  
cell 215-760-3000

PS, Zekaria should be searching for replacement counsel, **now** — is she looking for replacement counsel? Does she need some names of potential replacement attorneys? pls lmk thx

Begin forwarded message:

**From:** GARY LIGHTMAN <[garylighman@lightmanlaw.com](mailto:garylighman@lightmanlaw.com)>  
**Subject:** Re: Zekaria Deposition 5/28/24  
**Date:** May 15, 2024 at 9:17:14 AM EDT  
**To:** Patrick Healey <[phealey@rebarkelly.com](mailto:phealey@rebarkelly.com)>  
**Cc:** "Laver, Seth L." <[slaver@goldbergsegalla.com](mailto:slaver@goldbergsegalla.com)>, Joseph Ross <[jross@goldbergsegalla.com](mailto:jross@goldbergsegalla.com)>, Gary Weiss <[wgary4109@gmail.com](mailto:wgary4109@gmail.com)>, sam gross <[charltonholdinggroupllc@aol.com](mailto:charltonholdinggroupllc@aol.com)>, Sam Gross

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Patrick,

In response to your below email:

You have continually failed to provide us with a date for Zekaria's deposition, despite repeated requests for you to give us available dates, forcing us to select the 5/14 deposition date on our own. And there is nothing improper in continuing with the lawsuit, notwithstanding your Motion to Withdraw. And you did just unilaterally fail to produce Zekaria for her deposition as properly scheduled on May 14, pursuant to the Rules of Court.

We have properly re-scheduled the Zekaria deposition for May 28, pursuant to the Rules of Court. If you want to move the 5/28 date of Zekaria's deposition, then (1) please tell us why Zekaria is not available on 5/28, and (2) let us know which of the following dates work for her deposition: May 22, 23, 24, 30. Otherwise, we intend to move forward with the Zekaria deposition on 5/28 as scheduled, absent a Court Order to the contrary.

Please be guided accordingly.

thx  
Gary Lightman  
cell 215-760-3000

cc: all counsel/parties

On May 15, 2024, at 8:00 AM, Patrick Healey  
<[phealey@rebarkelly.com](mailto:phealey@rebarkelly.com)> wrote:

Gary:

Just to correct the misstatement that you have made. The Zekaria Defendants did not "fail to appear" for depositions on May 14, 2024. We had informed you on May 6, 2024 that we were unavailable for a for a deposition on May 14. Just because you unilaterally pick dates for depositions does not mean that others are necessarily available. We are also not available on May 28 for a deposition. Again, as we stated before, it is improper for you to schedule the depositions of the Zekaria defendants while our Motion to withdraw is pending and is scheduled for a hearing.

Pat Healey

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-----Original Message-----

From: Gary Lightman <[garyl@lightmanlaw.com](mailto:garyl@lightmanlaw.com)>  
Sent: Wednesday, May 15, 2024 12:03 AM  
To: Patrick Healey <[phealey@rebarkelly.com](mailto:phealey@rebarkelly.com)>  
Cc: Laver, Seth L. <[slaver@goldbergsegalla.com](mailto:slaver@goldbergsegalla.com)>; Joseph Ross <[jross@goldbergsegalla.com](mailto:jross@goldbergsegalla.com)>; Gary Weiss <[wgary4109@gmail.com](mailto:wgary4109@gmail.com)>; sam gross <[charltonholdinggroupllc@aol.com](mailto:charltonholdinggroupllc@aol.com)>; Sam Gross <[Scg1212@gmail.com](mailto:Scg1212@gmail.com)>; K. DiTomaso <[kditomaso@lightmanlaw.com](mailto:kditomaso@lightmanlaw.com)>; G. Manochi <[gmanochi@lightmanlaw.com](mailto:gmanochi@lightmanlaw.com)>; GARY LIGHTMAN <[ltag8r@me.com](mailto:ltag8r@me.com)>  
Subject: Zekaria Deposition 5/28/24

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

We are pleased to announce that our New York office has relocated, and therefore our address has changed.

Please note, our New York office address is now:

256 West 36th Street

230 West 30th Street  
Suite 900  
New York, NY 10018

—  
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